

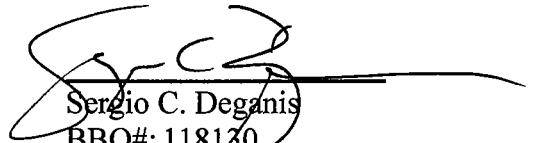
THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ERIC C. PEARCE	:	CIVIL ACTION NO.:
	:	1:05-cv-11694
Plaintiff,	:	
	:	
v.	:	JURY TRIAL DEMANDED
	:	
KEITH BAUMM,	:	
ADVANCED COMPOSITE	:	
ENGINEERING D/B/A	:	
AEGIS BICYCLES,	:	
AEGIS HANDMADE CARBON	:	
FIBER BICYCLES, LLC dba	:	
AEGIS BICYCLES,	:	
AEGIS RACING BIKES USA, LLC	:	
dba AEGIS BICYCLES,	:	
FASTBIKES USA, LLC dba	:	
AEGIS BICYCLES,	:	
WYMAN-GORDON INVESTMENT	:	
CASTINGS, INC., AND	:	
STURM, RUGER & CO., INC	:	
Defendants,	:	AUGUST 3, 2007

MOTION FOR ENLARGEMENT

Pursuant to Federal Rules of Civil Procedure 6(b), the undersigned plaintiff hereby moves for an enlargement of time of thirty (60) days to respond to the defendants Aegis Handmade Carbon Fiber Bicycles, LLC, Aegis Racing Bikes USA, LLC and Fastbikes USA, LLC's Motion to Dismiss dated July 19, 2007. An affidavit of good cause is attached hereto in support of this motion.

Respectfully submitted:
THE PLAINTIFF,
Eric C. Pearce,
By his attorneys,
Ouellette, Deganis & Gallagher, LLC



Sergio C. Deganis
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AEGIS BICYCLES,	:	
WYMAN-GORDON INVESTMENT	:	
CASTINGS, INC., AND	:	
STURM, RUGER & CO., INC	:	
Defendants,	:	AUGUST 3, 2007

AFFIDAVIT OF GOOD CAUSE

I, Sergio C. Deganis, having been duly sworn, depose and say and hereby attest to the following facts:

- 1: I believe in the obligation of an oath;
- 2: I am of legal age, over 18;
3. On July 30, 2007 I served Interrogatories and Requests for Production on the Aegis Defendants concerning the Aegis Defendants' purchase of Advanced Composite Engineering d/b/a Aegis Bicycles.
4. I am currently attempting to schedule the deposition of the Aegis Defendants' 30(b)(6) representative concerning the Aegis Defendants' purchase of Advanced Composite Engineering d/b/a Aegis Bicycles.

5. The above mentioned interrogatories and deposition are necessary to properly respond to the Defendants' Motion to Dismiss as they address the transfer of ownership between Advanced Composite Engineering and the Aegis Defendants and the resulting successor liability thereof.
6. I have contacted Atty. Johnson who represents the Aegis Defendants and he does not consent to the granting of this Motion.

Dated at Cheshire, Connecticut, this 3rd day of August, 2007

Signed: 

Name: Sergio C. Deganis

The foregoing Affidavit was acknowledged before me this 3rd day of August, 2007.

State of Connecticut

County of New Haven



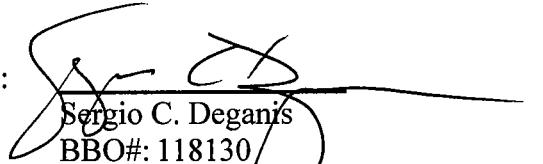
Notary Public/Commissioner of
Superior Court

PATRICIA MALIS
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, 2009

CERTIFICATION

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on August 3, 2007. I further certify that pursuant to local rule 7.1(a) I have contacted Attorney Johnson regarding this matter and he objects to the granting of this motion.

By:



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